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PATENT APPLICATION

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IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Mark S. Secrist

Confirmation No.: 1596

Application No.: 10/765,378

Examiner: Rashedul Hassan

Filing Date: January 27, 2004

Group Art Unit: 2179

Title: PORTAL DESIGN SYSTEM AND METHODOLOGY

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on October 3, 2007.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐ (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

☐ 1st Month
\$120

☐ 2nd Month
\$450

☐ 3rd Month
\$1020

☐ 4th Month
\$1590

☐ The extension fee has already been filed in this application.

☒ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$ 500 . At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

Respectfully submitted,

Mark S. Secrist

By:

Jody C. Bishop

Attorney/Agent for Applicant(s)

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Docket No.: 200313705-1
(PATENT)

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In re Patent Application of:
Mark S. Secrist

Application No.: 10/765,378

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For: PORTAL DESIGN SYSTEM AND
METHODOLOGY

Examiner: Rashedul Hassan

APPEAL BRIEF

MS Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

As required under § 41.37(a), this brief is filed within two months of the Notice of Appeal filed in this case on October 3, 2007, and is in furtherance of said Notice of Appeal.

The fees required under § 41.20(b)(2) are dealt with in the accompanying TRANSMITTAL OF APPEAL BRIEF.

This brief contains items under the following headings as required by 37 C.F.R. § 41.37 and M.P.E.P. § 1205.2:

- I. Real Party In Interest
- II. Related Appeals and Interferences
- III. Status of Claims
- IV. Status of Amendments
- V. Summary of Claimed Subject Matter
- VI. Grounds of Rejection to be Reviewed on Appeal
- VII. Argument
- VIII. Claims Appendix
- IX. Evidence Appendix
- X. Related Proceedings Appendix

I. REAL PARTY IN INTEREST

The real party in interest for this appeal is:

Hewlett-Packard Development Company, L.P., a Limited Partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249, Houston, TX 77070, U.S.A. (hereinafter “HPDC”). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

II. RELATED APPEALS AND INTERFERENCES

There are no appeals, interferences, or judicial proceedings which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

A. Total Number of Claims in Application

There are 25 claims pending in application.

B. Current Status of Claims

1. Claims canceled: None
2. Claims withdrawn from consideration but not canceled: None
3. Claims pending: 1-25
4. Claims allowed: None
5. Claims rejected: 1-25

C. Claims On Appeal

The claims on appeal are claims 1-25

IV. STATUS OF AMENDMENTS

A Final Office Action rejecting the claims of the present application was mailed August 3, 2007. In response, Applicant did not file an Amendment After Final Rejection, but instead filed a Notice of Appeal, which this brief supports. Accordingly, the claims on appeal are those as rejected in the Final Office Action of August 3, 2007. A complete listing of the claims is provided in the Claims Appendix hereto.

V. SUMMARY OF CLAIMED SUBJECT MATTER

The following provides a concise explanation of the subject matter defined in each of the separately argued claims involved in the appeal, referring to the specification by page and line number and to the drawings by reference characters, as required by 37 C.F.R. § 41.37(c)(1)(v). Each element of the claims is identified by a corresponding reference to the specification and drawings where applicable. It should be noted that the citation to passages in the specification and drawings for each claim element does not imply that the limitations from the specification and drawings should be read into the corresponding claim element.

According to one claimed embodiment, such as that of independent claim 1, a method comprises determining (*see* operational block 700 of FIGURE 7 and paragraphs 0005 and 0029 of the specification) a construction design for an adapted portal application. The method further comprises determining (*see* operational block 701 of FIGURE 7 and paragraphs 0005 and 0029 of the specification) a model for separation or presentation logic and application logic of an existing Web application to be adapted into said portal application; and determining (*see* operational block 702 of FIGURE 7 and paragraphs 0005 and 0029 of the specification) a navigation construction for said adapted portal application. The method further comprises selecting (*see* operational block 703 of FIGURE 7 and paragraphs 0005 and 0029 of the specification) a level of customization to apply to said adapted portal application; and selecting (*see* operational block 704 of FIGURE 7 and paragraphs 0005 and 0029 of the specification) an isolation model for isolating business logic from said adapted portal application. The method further comprises employing the determined construction design, the determined model, the determined navigation construction, the selected level of customization, and the selected isolation model for adapting said existing Web application into said portal application in a manner that maintains said existing Web application's functionality within said portal application, *see e.g.*, paragraphs 0022-0023 and 0027 of the specification..

In certain embodiments, such as that of dependent claim 3, the determining a navigation construction includes one or more of: retrieving selected information based on an event defined by uniform resource locator (URL) interaction in said Web application; and creating a new

window for information retrieved in response to a call to said URL from said Web application, *see* paragraphs 0018, 0020-0023, and 0028 of the specification.

According to another claimed embodiment, such as that of independent claim 6, a method for adapting a Web application to a portal application comprises adding (*see* operational block 300 of FIGURE 3 and paragraphs 0006 and 0022-0023 of the specification) at least one component of said Web application to a portal platform. The method further comprises creating (*see* operational block 301 of FIGURE 3 and paragraphs 0006 and 0022-0023 of the specification) a plurality of portlets within said portal platform, wherein each of said plurality includes pages representing a view for said at least one component of said Web application; and defining (*see* operational block 302 of FIGURE 3 and paragraphs 0006 and 0022-0023 of the specification) at least one Web flow relationship representing interactions between said at least one component of said Web application. The method further comprises converting (*see* operational block 303 of FIGURE 3 and paragraphs 0006 and 0022-0023 of the specification) said at least one Web flow relationship into at least one event, defined within said plurality of portlets, wherein said at least one event corresponds to said interactions.

According to another claimed embodiment, such as that of independent claim 11, a methodology for converting a Web application into a portal application comprises moving (*see* operational block 500 of FIGURE 5 and paragraphs 0007 and 0027 of the specification) Web components from said Web application into a portal framework corresponding to said portal application. The method further comprises dividing (*see* operational block 501 of FIGURE 5 and paragraphs 0007 and 0027 of the specification) said portal application into a plurality of portlets, wherein each of said plurality serves content of one or more of said Web applications; and providing (*see* operational block 502 of FIGURE 5 and paragraphs 0007 and 0027 of the specification) navigation resources to said portal application.

In certain embodiments, such as that of dependent claim 19, the providing step comprises one or more of: converting uniform resource locator (URL) calls from said Web application to interaction events for said portal application; and creating a new window for information

retrieved in response to a call to said URL from said Web application, *see* paragraphs 0018, 0020-0023, and 0028 of the specification.

According to another claimed embodiment, such as that of independent claim 21, a system for adapting a Web application to a portal application comprises means (e.g., computer-executable software code executing on a computer, *see e.g.*, paragraphs 0020-0023 of the specification) for adding (*see* operational block 300 of FIGURE 3 and paragraphs 0008 and 0022-0023 of the specification) one or more Web application components to said portal application. The system further comprises means (e.g., computer-executable software code executing on a computer, *see e.g.*, paragraphs 0020-0023 of the specification) for generating (*see* operational block 301 of FIGURE 3 and paragraphs 0008 and 0022-0023 of the specification) a plurality of portlets within said portal application, wherein each of said plurality includes a view for said one or more Web application components. The system further comprises means (e.g., computer-executable software code executing on a computer, *see e.g.*, paragraphs 0020-0023 of the specification) for defining (*see* operational block 302 of FIGURE 3 and paragraphs 0008 and 0022-0023 of the specification) at least one Web flow relationship representing interactions between said one or more Web application components; and means (e.g., computer-executable software code executing on a computer, *see e.g.*, paragraphs 0020-0023 of the specification) for converting (*see* operational block 303 of FIGURE 3 and paragraphs 0008 and 0022-0023 of the specification) said at least one Web flow relationship into at least one interaction event, defined within said plurality of portlets, wherein said at least one interaction event corresponds to said interactions.

In certain embodiments, such as that of dependent claim 24, the system further comprises means (e.g., computer-executable software code executing on a computer, *see e.g.*, paragraphs 0020-0023 of the specification) for modifying business logic of said one or more Web application components to return output as a data-descriptive meta language document, *see* paragraph 0028 of the specification.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-25 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,327,628 issued to Anuff et al. (hereinafter "*Anuff*").

VII. ARGUMENT

Appellant respectfully traverses the outstanding rejections of the pending claims, and requests that the Board reverse the outstanding rejections in light of the remarks contained herein. The claims do not stand or fall together. Instead, Appellant presents separate arguments for various independent and dependent claims. Each of these arguments is separately argued below and presented with separate headings and sub-heading as required by 37 C.F.R. § 41.37(c)(1)(vii).

A. Rejections Under 35 U.S.C. §102(b) over *Anuff*

Claims 1-25 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Anuff*. Appellant respectfully traverses this rejection below.

To anticipate a claim under 35 U.S.C. § 102, a single reference must teach every element of the claim, *see* M.P.E.P. § 2131. Thus, § 102 anticipation is not found when the applied art is lacking or missing a specific feature or the structure of the claimed invention. Further, the Federal Circuit has explained: “There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention.” *Scripps Clinic & Research Found. v. Genentech Inc.*, 927 F.2d 1565 (Fed. Cir. 1991). As discussed further below, claims 1-25 are not anticipated under § 102 by *Anuff* because *Anuff* fails to teach each and every element of these claims as required by M.P.E.P. § 2131.

Independent Claim 1 and Dependent Claims 2 and 4-5

Claim 1 recites:

A method comprising:
determining a construction design for an adapted portal application;
determining a model for separation or presentation logic and application logic of an existing Web application to be adapted into said portal application;
determining a navigation construction for said adapted portal application;
selecting a level of customization to apply to said adapted portal application;
selecting an isolation model for isolating business logic from said adapted portal application; and
employing the determined construction design, the determined model, the determined navigation construction, the selected level of customization, and the selected isolation model for adapting said existing Web application into said portal application in a manner that maintains said existing Web application's functionality within said portal application. (Emphasis added).

Anuff fails to teach all elements of claim 1. *Anuff* is directed generally to a portal infrastructure, and in particular to a modular portal infrastructure, *see e.g.*, the Abstract of *Anuff*. While *Anuff* proposes a modular portal infrastructure or framework, *Anuff* fails to address any technique for adapting an existing Web application into the proposed portal infrastructure.

Anuff recognizes that a desire may exist to enable a user “to have quick access to various resources and data provided by the employer, while at the same time being able to view information provided over the Internet, such as news headlines, financial data, and vendor data.” Col. 3, lines 32-36. “To this end, therefore, portals have become popular mechanisms that enable users to access information from multiple different network sites at once.” Col. 3, lines 36-39. Thus, *Anuff* proposes a modular portal framework, wherein by “interacting with any one of these modules, the user can access the information or services provided by that module.” Col. 4, lines 1-3. “Thus, by clicking on a headline in the ‘News’ module, the user can be presented with the full text of the news story to which the headline pertains.” Col. 4, lines 3-5.

Again, while *Anuff* proposes such modules to be employed in its portal framework, *Anuff* fails to address any technique for adapting an existing Web application in the proposed modular

portal framework. For instance, *Anuff* fails to disclose a technique for adapting an existing Web application to form a corresponding module to be used in its portal framework.

Accordingly, *Anuff* fails to disclose at least “employing the determined construction design, the determined model, the determined navigation construction, the selected level of customization, and the selected isolation model for adapting said existing Web application into said portal application in a manner that maintains said existing Web application’s functionality within said portal application”, as recited by claim 1.

In response to the above arguments, the Final Office Action raises an issue concerning the interpretation of the recited “existing Web application”. “The Examiner realizes that *Anuff* does not explicitly teach a technique that takes coded components, in other words an instance of an implementation, of a Web application and modify or incorporate those coded components to form corresponding modules to be used in its portal framework”, page 7 of the Final Office Action. However, the Examiner contends that the recited “existing Web application” can be reasonably more broadly interpreted to mean a “concept of a Web application”, which appears to refer to any functionality that may be performed via the Web. For instance, the Final Office Action asserts on page 7 thereof:

A “Web application” as recited in the claim, can reasonably be interpreted, in the broadest reasonable interpretation, to mean a concept of a Web application. For example, just the concept of searching the web with a keyword for retrieving information relevant to the keyword can be broadly referred to as a Web application, even though this concept can be implemented using various different techniques as various different instances of implementation of the Web application. Therefore, “an existing Web application” as recited in the claim can reasonably be interpreted to mean “a known concept of a Web application” and not necessarily be interpreted to be an existing instance of a particular implementation of a Web application.

Appellant respectfully disagrees, and submits that the Examiner’s interpretation of an “existing Web application” as a known concept of a Web application (which appears to refer to a known functionality that is performed via the Web, such as the concept of performing keyword searching over the web) is unreasonably broad. The claim language should be interpreted

consistent with the specification of the application. That is, the claims are to be given their broadest reasonable interpretation in light of the specification, *see* M.P.E.P. §2111. “Claims are not to be read in a vacuum, and limitations therein are to be interpreted in light of the specification in giving them their ‘broadest reasonable interpretation’.” M.P.E.P. §2111.01(II), *quoting In re Marosi*, 710 F.2d 799, 218 USPQ 289 (Fed. Cir. 1983). Indeed, if read in a vacuum, the word “Web” could be interpreted as a spider web, rather than the well-known computer network referred to as the “Web”. Likewise, when properly interpreted in light of its usage in the specification of the present application, “an existing Web application” is not reasonably interpreted as referring to any known function (or concept) than can be performed via the Web.

In referring to adapting an existing Web application into a portal framework, the present application consistently refers to such an existing Web application as being, in the words of the Examiner, an instance of an implementation of a Web application, rather than a concept of a Web application. For instance, in paragraph 0027, the present application describes that a “Web application is typically constructed from a number of Web components appropriately coded by the developer that provide some information or application logic to the user.” Paragraph 0027 goes on to describe that “the code underlying the Web components are moved by the developer from the Web application into a portal framework corresponding to the portal application.” An example is further provided in paragraph 0023, which states that “an existing HTML page may include several different components that provide data to present to a user over the Web browser.”

Thus, the recited “existing Web application” is not reasonably interpreted as referring to any known function (or “concept”) that may be performed via the web, as asserted by the Examiner, when considered consistent with its use in the specification of the present application. When this term of the claim is afforded a reasonable interpretation, *Anuff* fails to teach the above-emphasized element of claim 1, as conceded by the Examiner (“The Examiner realizes that *Anuff* does not explicitly teach a technique that takes coded components, in other words an instance of an implementation, of a Web application and modify or incorporate those coded

components to form corresponding modules to be used in its portal framework”, page 7 of the Final Office Action).

Therefore, *Anuff* fails to anticipate claim 1. Accordingly, Appellant requests that the Board overturn this rejection.

Claims 2 and 4-5 each depend either directly or indirectly from independent claim 1, and are thus likewise believed to be allowable at least based on their dependency from claim 1 for the reasons discussed above. Accordingly, Appellant respectfully requests that the rejection of claims 2 and 4-5 also be overturned.

Dependent Claim 3

Dependent claim 3 depends from claim 1, and thus inherits all of the limitations of claim 1 in addition to its own supplied limitations. It is respectfully submitted that dependent claim 3 is allowable at least because of its dependence from claim 1 for the reasons discussed above.

Claim 3 further recites “wherein said determining a navigation construction includes one or more of: retrieving selected information based on an event defined by uniform resource locator (URL) interaction in said Web application; and creating a new window for information retrieved in response to a call to said URL from said Web application” (emphasis added). *Anuff* further fails to teach creating a new window for information retrieved in response to a call to a URL from a Web application. Thus, this further element of claim 3 is not taught by *Anuff*, and the rejection of claim 3 should therefore be overturned for this further reason.

Independent Claim 6 and Dependent Claims 7-10

Claim 6 recites:

A method for adapting a Web application to a portal application comprising:
adding at least one component of said Web application to a portal platform;
creating a plurality of portlets within said portal platform, wherein each of said plurality includes pages representing a view for said at least one component of said Web application;
defining at least one Web flow relationship representing interactions between said at least one component of said Web application; and
converting said at least one Web flow relationship into at least one event, defined within said plurality of portlets, wherein said at least one event corresponds to said interactions. (Emphasis added).

Anuff fails to teach all elements of claim 6. As discussed above with claim 1, *Anuff* is directed generally to a portal infrastructure, and in particular to a modular portal infrastructure, *see e.g.*, the Abstract of *Anuff*. While *Anuff* proposes a module portal infrastructure or framework, *Anuff* fails to address any technique for adapting an existing Web application into the proposed portal infrastructure. Thus, *Anuff* fails to disclose a method for “adapting a Web application to a portal application” in the manner recited by claim 6.

Further, the method of claim 6 for so adapting a Web application to a portal application recites, in part, “defining at least one Web flow relationship representing interactions between said at least one component of said Web application; and converting said at least one Web flow relationship into at least one event, defined within said plurality of portlets, wherein said at least one event corresponds to said interactions.” *Anuff* fails to disclose at least these steps of the method. Again, *Anuff* fails to disclose any technique for adapting a web application to its proposed modular portal infrastructure. While *Anuff* discloses modules, *Anuff* does not disclose that adapting a web application to such a module includes defining at least one Web flow relationship representing interactions, and converting the Web flow relationship into at least one event, defined within the portlets, as recited by claim 6.

The Final Office Action asserts on page 5 thereof that “defining at least one Web flow relationship is inherent in the reference since there has to be a defined Web flow relationship in order to show the appropriate page based on the user interaction at the portal”. Further, the Office Action asserts on pages 5-6 thereof that “Anuff teaches implementing the defined Web flow relationship by converting it into user selection events such as selecting a link or button in order to display appropriate page based on the selection”. However, this appears to focus on the proposed functionality of a given module that is implemented within *Anuff*’s portal framework, rather than a process for adapting an existing Web application into the portal (e.g., into the given module). For instance, while the operation of a given module within *Anuff*’s portal may support a certain flow of interaction with a user by enabling the user to click on a hyperlink, etc., *Anuff* fails to disclose defining a Web flow relationship for a Web application and converting such relationship into an event defined in a portlet of a portal in order to adapt a Web application into such portal (e.g., in order to adapt a Web application into a module). Indeed, the modules of *Anuff* may be created from scratch, rather than attempting to adapt an existing Web application into such modules, as *Anuff* provides no disclosure of any such adapting of an existing Web application into its portal framework.

Further, as discussed above with claim 1, “existing Web application” is not properly interpreted as referring to any known Web concept. Indeed, claim 6 expressly recites that the Web application has at least one component, and a Web flow relationship is defined representing interactions between said at least one component of said Web application. See e.g., paragraphs 0022-0023 and 0027 of the present application. Accordingly, interpretation such an existing Web application as a known concept (or function) of the web is particularly unreasonably broad with regard to claim 6, which expressly recites that the Web application comprises at least one component.

Accordingly, *Anuff* fails to disclose at least the above-identified elements of claim 6. Therefore, Appellant respectfully requests that this rejection be overturned.

Claims 7-10 each depend either directly or indirectly from independent claim 6, and are thus likewise believed to be allowable at least based on their dependency from claim 6 for the

reasons discussed above. Accordingly, Appellant respectfully requests that the rejection of claims 7-10 also be overturned.

Independent Claim 11 and Dependent Claims 12-18 and 20

Claim 11 recites:

A methodology for converting a Web application into a portal application comprising:
moving Web components from said Web application into a portal framework corresponding to said portal application;
dividing said portal application into a plurality of portlets, wherein each of said plurality serves content of one or more of said Web applications; and
providing navigation resources to said portal application. (Emphasis added).

Anuff fails to teach all elements of claim 11. As discussed above with claim 1, *Anuff* is directed generally to a portal infrastructure, and in particular to a modular portal infrastructure, *see e.g.*, the Abstract of *Anuff*. While *Anuff* proposes a module portal infrastructure or framework, *Anuff* fails to address any technique for converting a Web application into the proposed portal infrastructure. Thus, *Anuff* fails to disclose a method for “converting a Web application into a portal application” in the manner recited by claim 11.

Further, the method of claim 11 for so converting a Web application into a portal application recites, in part, “moving Web components from said Web application into a portal framework corresponding to said portal application”. *Anuff* fails to disclose at least this step of the method. Again, *Anuff* fails to disclose any technique for converting a web application to its proposed modular portal infrastructure. While *Anuff* discloses modules, *Anuff* does not disclose that adapting a web application to such a module includes moving Web components from said Web application into a portal framework (e.g., module), as recited by claim 11. Indeed, the modules of *Anuff* may be created from scratch, rather than attempting to convert an existing Web application into such modules, as *Anuff* provides no disclosure of any such converting of an existing Web application into its portal framework.

Moreover, as discussed above with claim 1, “existing Web application” is not properly interpreted as referring to any known Web concept. Indeed, claim 11 expressly recites that the Web application has at least one component, and a Web flow relationship is defined representing interactions between said at least one component of said Web application. *See e.g.*, paragraphs 0022-0023 and 0027 of the present application. Accordingly, interpretation such an existing Web application as a known concept (or function) of the web is particularly unreasonably broad with regard to claim 11, which expressly recites that the Web application comprises at least one component.

Accordingly, *Anuff* fails to disclose at least the above-identified elements of claim 11. Therefore, Appellant respectfully requests that this rejection be overturned.

Claims 12-18 and 20 each depend either directly or indirectly from independent claim 11, and are thus likewise believed to be allowable at least based on their dependency from claim 11 for the reasons discussed above. Accordingly, Appellant respectfully requests that the rejection of claims 12-18 and 20 also be overturned.

Dependent Claim 19

Dependent claim 19 depends from claim 11, and thus inherits all of the limitations of claim 11 in addition to its own supplied limitations. It is respectfully submitted that dependent claim 19 is allowable at least because of its dependence from claim 11 for the reasons discussed above.

Claim 19 further recites “wherein said providing step comprises one or more of: converting uniform resource locator (URL) calls from said Web application to interaction events for said portal application; and creating a new window for information retrieved in response to a call to said URL from said Web application” (emphasis added). *Anuff* further fails to teach creating a new window for information retrieved in response to a call to a URL from a Web application. Thus, this further element of claim 19 is not taught by *Anuff*, and the rejection of claim 19 should therefore be overturned for this further reason.

Independent Claim 21 and Dependent Claims 22-23 and 25

Claim 21 recites:

A system for adapting a Web application to a portal application comprising:
means for adding one or more Web application components to said portal application;
means for generating a plurality of portlets within said portal application, wherein each of said plurality includes a view for said one or more Web application components;
means for defining at least one Web flow relationship representing interactions between said one or more Web application components; and
means for converting said at least one Web flow relationship into at least one interaction event, defined within said plurality of portlets, wherein said at least one interaction event corresponds to said interactions. (Emphasis added).

Anuff fails to teach all elements of claim 21. As discussed above with claim 1, *Anuff* is directed generally to a portal infrastructure, and in particular to a modular portal infrastructure, see e.g., the Abstract of *Anuff*. While *Anuff* proposes a module portal infrastructure or framework, *Anuff* fails to address any technique for adapting a Web application into the proposed portal infrastructure. Thus, *Anuff* fails to disclose a system for “adapting a Web application to a portal application” in the manner recited by claim 21.

Further, the system of claim 21 for so adapting a Web application to a portal application recites, in part, “means for defining at least one Web flow relationship representing interactions between said one or more Web application components; and means for converting said at least one Web flow relationship into at least one interaction event, defined within said plurality of portlets, wherein said at least one interaction event corresponds to said interactions.” *Anuff* fails to disclose at least these means of the system. Again, *Anuff* fails to disclose any technique for adapting a web application to its proposed modular portal infrastructure. While *Anuff* discloses modules, *Anuff* does not disclose that adapting a web application to such a module includes use of a means for defining at least one Web flow relationship representing interactions, and means for converting the Web flow relationship into at least one interaction event, defined within the portlets, as recited by claim 21. Indeed, as mentioned with claim 6 above, the modules of *Anuff*

may be created from scratch, rather than attempting to adapt an existing Web application into such modules, as *Anuff* provides no disclosure of any such adapting of an existing Web application into its portal framework.

Moreover, as discussed above with claim 1, the recited “Web application” is not properly interpreted as referring to any known Web concept. Indeed, claim 21 expressly recites one or more Web application components. Accordingly, interpretation such a Web application as a known concept (or function) of the web is particularly unreasonably broad with regard to claim 21, which expressly recites one or more Web application components.

Accordingly, *Anuff* fails to disclose at least the above-identified elements of claim 21. Therefore, Appellant respectfully requests that the rejection of claim 21 be overturned.

Claims 22-23 and 25 each depend either directly or indirectly from independent claim 21, and are thus likewise believed to be allowable at least based on their dependency from claim 21 for the reasons discussed above. Accordingly, Appellant respectfully requests that the rejection of claims 22-23 and 25 also be overturned.

Dependent Claim 24

Dependent claim 24 depends from claim 21, and thus inherits all of the limitations of claim 21 in addition to its own supplied limitations. It is respectfully submitted that dependent claim 24 is allowable at least because of its dependence from claim 21 for the reasons discussed above.

Claim 24 further recites “means for modifying business logic of said one or more Web application components to return output as a data-descriptive meta language document”. *Anuff* further fails to teach modifying business logic of a Web application component to return output as a data-descriptive meta language document. Thus, this further element of claim 24 is not taught by *Anuff*, and the rejection of claim 24 should therefore be overturned for this further reason.

Conclusion

In view of the above, Appellant requests that the board overturn the outstanding rejections of claims 1-25. Attached hereto are a Claims Appendix, Evidence Appendix, and Related Proceedings Appendix. As noted in the attached Evidence Appendix, no evidence pursuant to §§ 1.130, 1.131, or 1.132 or entered by or relied upon by the examiner is being submitted. Also, no related appeals are identified in Section II above, and thus as noted by the Related Proceedings Appendix, no decisions in any such related proceedings are provided.

Respectfully submitted,

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: December 3, 2007

Signature: Donna Forbit
(Donna Forbit)

By 

Jody C. Bishop

Registration No.: 44,034

Attorney for Applicant/Agent

Dated: December 3, 2007

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VIII. CLAIMS APPENDIX

Claims Involved in the Appeal of Application Serial No. 10/765,378

1. (Previously Presented) A method comprising:
determining a construction design for an adapted portal application;
determining a model for separation or presentation logic and application logic of an existing Web application to be adapted into said portal application;
determining a navigation construction for said adapted portal application;
selecting a level of customization to apply to said adapted portal application;
selecting an isolation model for isolating business logic from said adapted portal application; and
employing the determined construction design, the determined model, the determined navigation construction, the selected level of customization, and the selected isolation model for adapting said existing Web application into said portal application in a manner that maintains said existing Web application's functionality within said portal application.
2. (Original) The method of claim 1 wherein said determining a construction design includes one or more of:
determining a visual theme of said adapted portal application; and
determining a format of content for said adapted portal application.
3. (Original) The method of claim 1 wherein said determining a navigation construction includes one or more of:
retrieving selected information based on an event defined by uniform resource locator (URL) interaction in said Web application; and
creating a new window for information retrieved in response to a call to said URL from said Web application.
4. (Original) The method of claim 1 wherein said selecting a level of customization comprises one or more of:

presenting an interactive window to obtain customization information from a user, wherein said obtained customization information is stored in a portal framework; and
retrieving existing login information related to said user for inclusion in content of said adapted portal application.

5. (Previously Presented) The method of claim 1 wherein said selecting an isolation model comprises one or more of:

modifying said business model to return output as at least one data-descriptive meta language document; and

creating a component to connect said adapted portal application to one or more Web services for providing said business logic to said adapted portal application.

6. (Original) A method for adapting a Web application to a portal application comprising:

adding at least one component of said Web application to a portal platform;

creating a plurality of portlets within said portal platform, wherein each of said plurality includes pages representing a view for said at least one component of said Web application;

defining at least one Web flow relationship representing interactions between said at least one component of said Web application; and

converting said at least one Web flow relationship into at least one event, defined within said plurality of portlets, wherein said at least one event corresponds to said interactions.

7. (Original) The method of claim 6 further comprising:

creating a customization application for obtaining customization information from a user.

8. (Original) The method of claim 7 further comprising:

defining a storage utility to store said customization information to said portal platform.

9. (Original) The method of claim 6 further comprising:

modifying business logic to return output as a data-descriptive meta language document.

10. (Original) The method of claim 6 further comprising:
creating a client interface to search a plurality of Web services;
coding said client interface to select one or more of said plurality of Web services to
provide business logic to said portal application.

11. (Original) A methodology for converting a Web application into a portal
application comprising:
moving Web components from said Web application into a portal framework
corresponding to said portal application;
dividing said portal application into a plurality of portlets, wherein each of said plurality
serves content of one or more of said Web applications; and
providing navigation resources to said portal application.

12. (Original) The methodology of claim 11 further comprising:
designing a construction layout for said plurality of portlets responsive to one or more of:
a visual theme of said portal application; and
content formatting of said portal application.

13. (Original) The methodology of claim 11 further comprising:
selecting customization to apply to said portal application.

14. (Original) The methodology of claim 13 wherein said selecting customization
comprises one or more of:
presenting a user interface to a user to gather customization information; and
obtaining personal login information from said portal framework related to said user.

15. (Original) The methodology of claim 14 wherein said customization information
is stored within said portal framework for customization.

16. (Original) The methodology of claim 14 further comprising:
displaying a second user interface to a user for updating said personal login information.

17. (Original) The methodology of claim 11 further comprising:
isolating process logic from said portal application.
18. (Original) The methodology of claim 17 wherein said isolating comprises one or more of:
modifying said process logic to output at least one data-descriptive meta language document; and
receiving process output from one or more Web services.
19. (Original) The methodology of claim 11 wherein said providing step comprises one or more of:
converting uniform resource locator (URL) calls from said Web application to interaction events for said portal application; and
creating a new window for information retrieved in response to a call to said URL from said Web application.
20. (Original) The methodology of claim 19 further comprising:
retrieving information related to said URL on detection of said interaction events.
21. (Original) A system for adapting a Web application to a portal application comprising:
means for adding one or more Web application components to said portal application;
means for generating a plurality of portlets within said portal application, wherein each of said plurality includes a view for said one or more Web application components;
means for defining at least one Web flow relationship representing interactions between said one or more Web application components; and
means for converting said at least one Web flow relationship into at least one interaction event, defined within said plurality of portlets, wherein said at least one interaction event corresponds to said interactions.

22. (Original) The system of claim 21 further comprising:
means for creating a customization interface for obtaining customization information from a user.

23. (Original) The system of claim 22 further comprising:
means for generating a storage utility to store said customization information in said portal application.

24. (Original) The system of claim 21 further comprising:
means for modifying business logic of said one or more Web application components to return output as a data-descriptive meta language document.

25. (Original) The system of claim 21 further comprising:
means for creating a service interface to search a plurality of Web services; and
means for coding said service interface to select one or more of said plurality of Web services to provide business logic to said portal application.

IX. EVIDENCE APPENDIX

No evidence pursuant to §§ 1.130, 1.131, or 1.132 or entered by or relied upon by the examiner is being submitted.

X. RELATED PROCEEDINGS APPENDIX

There are no appeals, interferences, or judicial proceedings which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal, and thus no copies of any decisions in any such related proceedings are provided.